

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Carriers Eligible to)	WC Docket No. 09-197
Receive Universal Service Support)	
)	
Commnet Wireless, LLC)	
)	
Petition for Streamlined Designation as a)	
Lifeline Broadband Provider Eligible)	
Telecommunications Carrier)	

**COMMNET WIRELESS, LLC
PETITION FOR STREAMLINED DESIGNATION AS A LIFELINE BROADBAND
PROVIDER ELIGIBLE TELECOMMUNICATIONS CARRIER**

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Its Attorneys

SUMMARY

Commnet Wireless, LLC¹ (“Commnet” or the “Company”) hereby seeks designation as a Lifeline Broadband Provider (LBP) Eligible Telecommunications Carrier (ETC), pursuant to section 214(e)(6) of the Communications Act of 1934, as Amended (the Act), section 54.202 of the Federal Communications Commission’s (FCC’s or the Commission’s) rules, the *Lifeline Modernization Order*,² and the *LBP Guidance Public Notice*³ for the limited purpose of providing mobile Broadband Internet Access Service (BIAS) supported by the Universal Service Fund (USF) Lifeline program. Section 214(e)(6) permits the Commission to grant LBP ETC designation and the Commission’s rules provide that states may not designate LBP ETCs. As described in greater detail herein, Commnet is capable of providing service that meets the minimum service standards set forth in section 54.408 of the Commission’s rules and satisfies all of the requirements for streamlined designation as an LBP ETC. The Company has an established track record of providing quality voice and broadband services to both Lifeline- and non-Lifeline subscribers. The Company has provided, without interruption, facilities based local and long distance voice services, broadband service and Lifeline voice services for over two years and provides voice and/or broadband service to more than 38,000 subscribers, including 12,900 non-Lifeline subscribers in six states. Therefore, Commnet is eligible for the 60-day streamlined processing of its LBP ETC designation and this Petition should be deemed granted within 60 days. *See* 47 C.F.R. § 54.202(d)(1).

¹ On behalf of itself and its wholly-owned subsidiary Commnet Four Corners, LLC.

² *See Lifeline and Link Up Reform and Modernization; Telecommunications Carriers Eligible for Universal Service Support; Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (Apr. 27, 2016), 31 FCC Rcd. 3962 (“*Lifeline Modernization Order*”).

³ *See Wireline Competition Bureau Provides Guidance Regarding Designation as a Lifeline Broadband Provider and Lifeline Broadband Minimum Service Standards*, WC Docket Nos. 11-42, 09-197, Public Notice, DA 16-118 (rel. Sept. 30, 2016) (“*LBP Guidance Public Notice*”).

Commnet's proposed BIAS Lifeline offering will provide eligible Lifeline subscribers with at least 500 megabytes (MB) of Internet access at reliable 3G speeds each month, increasing to one gigabyte (1 GB) beginning December 1, 2017, and to two gigabytes (2 GB) beginning December 1, 2018. The Company will not conduct credit checks or collect deposits from Lifeline-eligible subscribers, thereby eliminating service barriers for low-income or credit-challenged subscribers.

Further, all persons subscribing to Commnet's BIAS Lifeline offering will receive a Wi-Fi-enabled smartphone at no cost to the subscriber. This smartphone will help address the most compelling needs - including closing the "jobs gap" and the "homework gap" - of these consumers by allowing them to establish email accounts and access Internet- and apps-based job applications; monitor online homework assignments and progress reports; manage medical benefits and appointments; and stay in touch with friends and relatives.

Commnet's BIAS Lifeline offering will give customers the ability to access the Internet from almost anywhere, enabling them to engage in the digital economy in a manner comparable to the access enjoyed by non-Lifeline subscribers. Moreover, available hotspot-capable phones permit Commnet's Lifeline subscribers to tether other devices - *e.g.*, tablets, laptops and PCs - to their smartphone to perform tasks such as completing homework assignments or filling out job-applications that are designed for a larger screen.

Designating Commnet as an LBP ETC is in the public interest. With such status, Commnet will provide consumers with an alternative for obtaining quality, reliable and convenient 3G or better broadband service, when and where they need it, in areas where 39.3% of the population lives below the poverty line.⁴ Accordingly, and consistent with the streamlined

⁴ U.S. Census Bureau, 2000 data

processing provided for LBP ETCs in the *Lifeline Modernization Order*, Commnet respectfully requests expeditious review and approval of this Petition.

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PROVIDER ELIGIBLE TELECOMMUNICATIONS CARRIER**

Commnet Wireless, LLC⁵ (Commnet or the Company) pursuant to section 214(e) of the Communications Act of 1934, as Amended (the Act), 47 U.S.C. § 214(e) and section 54.202 of the Federal Communications Commission's (Commission's or FCC's) rules, 47 C.F.R. § 54.202, hereby requests streamlined designation as a Lifeline Broadband Provider (LBP) Eligible Telecommunications Carrier (ETC) of Broadband Internet Access Service (BIAS).⁶ Commnet does not herein request ETC status for the purpose of receiving support for voice only Lifeline service. Commnet acknowledges that designating ETC status for voice-only Lifeline service remains with the state regulatory agencies.

⁵ On behalf of itself and its wholly owned subsidiary Commnet Four Corners, LLC

⁶ See *Lifeline and Link Up Reform and Modernization; Telecommunications Carriers Eligible for Universal Service Support; Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd. 3962 (2016) (*Lifeline Modernization Order*) and *Wireline Competition Bureau Provides Guidance Regarding Designation as a Lifeline Broadband Provider and Lifeline Broadband Minimum Service Standards*, WC Docket Nos. 11-42, 09-197, Public Notice, DA 16-118 (rel. Sept. 30, 2016) (*LBP Guidance Public Notice*). Broadband internet access service is defined by the Commission as a "service by wire or radio that provides the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service." *Id.*, ¶30.

I. ABOUT COMMNET

For almost two decades, Commnet has been the premier wholesale wireless provider in the U.S. Commnet's mission has been to provide coverage in unserved and underserved rural areas -- those areas not covered by the national wireless carriers. As a result, Commnet has grown to be a trusted roaming partner of all four national carriers. Additionally, Commnet has roaming agreements with virtually all U.S. carriers and over 150 international carriers. This is possible because Commnet is one of the few companies that operate both GSM-based technologies (GSM/UMTS/HSPA/HSPA+) which support AT&T, T-Mobile, and most international users, as well as CDMA-based technologies including EVDO Rev. A which supports Sprint, Verizon and East Asian carriers. In addition, Commnet operates 700 MHz LTE, which supports 4G broadband data for both GSM-based and CDMA-based carriers.

Over the past five years, Commnet has been a growing retail provider in rural and underserved markets. Commnet supports its retail subscribers with either or both CDMA and LTE networks, depending upon what Commnet's spectrum holdings are within a given geographic area. As a result, Commnet has been a pioneer in bringing wireless telecommunications to Tribal areas, generally through cooperative arrangements with individual tribal governments or entities owned by tribal governments. Either directly or through affiliates, and under its "Choice Wireless" trademark, Commnet operates wireless networks serving the Navajo Nation,⁷ the Hopi Reservation, the Mescalero Apache Reservation, the San Carlos Apache Reservation, the Tohono O'odham Reservation, the Picuris Pueblo and the Northern

⁷ Commnet's operations within the Navajo Nation are via NTUA Wireless, LLC, which is managed and owned 49% by Commnet, but majority-owned by the Navajo Tribal Utility Authority, an instrumentality of the Navajo Nation government.

Cheyenne Reservation⁸. These networks have brought advanced wireless services to the residents of those tribal areas.

II. COMMNET MEETS THE COMMISSION'S REQUIREMENTS FOR DESIGNATION AS A LIFELINE BROADBAND PROVIDER

Section 54.202 of the Commission's rules outlines the requirements that must be met before the FCC can designate a carrier as an LBP ETC. As discussed in further detail below, Commnet satisfies these requirements and designating Commnet as a LBP ETC is warranted.

A. Commnet is a Common Carrier.

As a provider of BIAS to the public, Commnet is a common carrier. In the Lifeline Modernization Order, the Commission recognized BIAS as a telecommunications service. Commnet will provide wireless telecommunications service throughout its requested designated service area and, as a wireless telecommunications service provider, Commnet is regulated as a common carrier⁹. Commnet, therefore, meets the ETC requirement of being a common carrier.

B. Commnet will provide the supported services using its own facilities or (if needed) a combination of its own facilities and resale of another carriers service

Commnet will provide the supported services specified in Section 54.101(a) of the Commission's Rules throughout the proposed service area using its own facilities and resale or roaming if necessary. Commnet's facilities include its cellular network infrastructure, which consists of switching, trunking, cellular sites and network equipment.

⁸ Commnet was granted conditional ETC designation by the Montana Public Service Commission by order issued December 3, 2013. Given that the designation was conditioned upon Commnet receiving Tribal Mobility Fund Phase 1 funds, Commnet is currently designated an ETC and is providing Lifeline service only in areas within Rosebud County. Through this application, Commnet seeks to be designated as a LBP ETC throughout the Northern Cheyenne Reservation (see Exhibit A).

⁹ 47 U.S.C § 332(c)(1)(A)

C. Commnet certifies that it will comply with the service requirements applicable to the support that it receives, including the applicable minimum service standards¹⁰

Commnet certifies that it will comply with the minimum service requirements applicable to the support the Company receives, including the minimum service standards. Commnet will provide Lifeline supported mobile BIAS throughout the proposed service area and will make such services available to all qualified customers consistent with its coverage footprint. Commnet's proposed service area is attached hereto as **Exhibit A**.

Commnet also certifies that the Company's Lifeline supported mobile BIAS will comply with the Lifeline program's minimum service standards.¹¹ Commnet, under its "Choice Wireless" trademark, already provides Lifeline supported mobile BIAS plans in areas where the company has been designated an ETC. Further, Commnet understands that it must continue to comply with any future additions to or amendments of the Lifeline broadband rules and will revise its offerings as necessary to comply with Part 54 service standards.

In addition to providing broadband service to Lifeline subscribers, Commnet will provide subscribers with a Wi-Fi-enabled smart phone at no cost to the Lifeline-eligible consumer.¹² The Company also will offer hotspot-enabled phones permitting Lifeline-eligible subscribers to share their broadband service with others in their household. Lifeline-eligible subscribers will be able to purchase device upgrades providing benefits such as the ability to enjoy high-quality photos and video, experience faster load-times for on-device apps and services, and benefit from better storage and memory.

¹⁰ See 47 C.F.R. § 54.202(a)(1)(i); 54.408; *LBP Guidance Public Notice*, ¶10.

¹¹ 47 C.F.R. §54.408(b)(2)

¹² Commnet is not responsible for replacement costs of lost or stolen phones, or for phones damaged due to a subscriber's act or omission. See terms and conditions of service on the Commnet website, <https://us.choice-wireless.com/terms-and-conditions.html>.

D. Commnet has the ability to remain functional in emergency situations.¹³

Commnet is a facilities-based wireless telecommunications carrier with its own switching, transport, cell sites, and associated telecommunications facilities in the proposed ETC service area. Commnet will be able to function in emergency situations as set forth in Section 54.201(a)(2), which includes a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. Specifically, Commnet will have the following capabilities to remain functional in emergency situations:

Availability of fixed and portable back-up power generators at various network locations throughout Commnet's network that can be deployed in emergency situations.

Ability to reroute traffic around damaged or out-of-service facilities through the deployment of cell-on-wheels ("COWs"), redundant facilities, and dynamic rerouting of traffic over alternate facilities.

A network control center that monitors network traffic and anticipates traffic spikes, and can then (i) deploy network facilities to accommodate capacity needs, (ii) change call routing translations, and (iii) deploy COWs to temporarily meet traffic needs until longer-solutions, such as additional capacity and antenna towers can be deployed.

Sites not equipped with fixed generators typically have battery back-up systems installed to maintain service in the event of a widespread power outage.

E. Commnet will satisfy applicable consumer protection and service quality standards.¹⁴

Section 54.202(a)(3) of the Commission's rules state that a wireless applicant's commitment to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service (CTIA Consumer Code) will satisfy this consumer protection and service quality requirement. Commnet fully complies with applicable consumer

¹³ See 47 C.F.R. § 54.202(a)(2); *LBP Guidance Public Notice*, ¶10.

¹⁴ See 47 C.F.R. § 54.202(a)(3); *LBP Guidance Public Notice*, ¶10.

protection requirements, including without limitation the CTIA Consumer Code, and commits to continue to do so.

Additionally, Commnet subscribers can reach the Company in the following ways:

- Web: <https://us.choice-wireless.com/contact.html>
- Customer Support Hotline: (800) 246-4239
- Customer service is available between the hours of 6:00 a.m. - 9:00 p.m. CST, Monday-Saturday.

F. Commnet is financially and technically capable of providing Lifeline-supported mobile broadband services in compliance with the Commission's rules.¹⁵

Commission rule 54.202(a)(4) requires an ETC applicant to demonstrate financial and technical capability to comply with the applicable Lifeline service requirements. Commnet is a wholly-owned subsidiary of ATN International, Inc. ("ATN"), a publicly-traded corporation (symbol ATNI). ATN has a seventeen-year track record of increasing its quarterly dividend. As set forth in its Form 10-K filing with the Securities Exchange Commission for 2015, ATN has available working capital of over \$384 million as of December 31, 2015. Thus, Commnet is more than adequately capitalized.

Further, Commnet has been operating a wholesale wireless network for almost two decades and has more than half a decade of experience providing retail wireless service, including Lifeline service, in extremely rural and Tribal areas. In fact, Commnet is already providing Lifeline supported mobile broadband internet service in rural and Tribal areas that meet the Commission's rules. Therefore, Commnet is technically capable of providing Lifeline supported mobile broadband service in compliance with the Commission's rules.

¹⁵ See 47 C.F.R. §54.202(a)(4); *LBP Guidance Public Notice*, ¶10.

G. Terms and Conditions of Commnet's Broadband Plan for Lifeline Customers

Section 54.202(a)(6) of the Commission's rules state that common carriers seeking designation as an ETC must provide a summary of the Lifeline rate plans and the terms and conditions of such plans. Commnet will offer a Non-Tribal Lifeline Plan and a Tribal Lifeline Plan. The details of these rate plans are as follows:

	Non-Tribal Lifeline Plan	Tribal Lifeline Plan
Data (3G or better)	500 MB	3 GB
Voice Minutes	500 Minutes	Unlimited
Texts	Unlimited	Unlimited
Handset	Free	Free
Cost to Lifeline Subscribers	Free	Free

The terms and conditions for such plans are available at <https://us.choicewireless.com/terms-and-conditions.html>.

H. Commnet will advertise the availability of its service and charges in a manner reasonably designed to reach Lifeline-eligible consumers and will comply with the Commission's revised rules regarding information to be included in advertisements.¹⁶

Commnet intends to offer its Lifeline-supported mobile broadband internet services to all eligible consumers and, accordingly, will advertise its Lifeline services using media reasonably calculated to reach the general public as clarified in the *Lifeline Modernization Order*. In that order, the Commission clarified that "media of general distribution" is "any media reasonably

¹⁶ See 47 C.F.R. §§ 54.201(d)(2), 54.405(b); 47 U.S.C. § 214(e)(1)(B).

calculated to reach the general public or, for an LBP, the specific audience that makes up the demographic for a particular service offering.”¹⁷

Commnet *already* complies with the Commission’s Lifeline obligations with respect to Commnet’s existing Lifeline voice and broadband service offerings. Commnet’s advertising includes mobile enrollment events as a means of reaching those consumers that are likely to qualify for Lifeline broadband services and who may lack available means to fax or scan and email proof of eligibility documents. The Company uses media of general distribution to advertise the availability of its services, as well as the schedule of mobile enrollment events, to potential Lifeline subscribers, and will expand its advertising efforts if necessary to ensure that Lifeline-eligible subscribers are aware of the service offerings, consistent with 47 C.F.R. § 54.405(b). Commnet already ensures, and will continue to ensure, that all of its Lifeline advertising materials comply with section 54.405(c) of the Commission’s rules. Commnet’s advertising materials state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) that documentation is necessary for enrollment; and (vii) Commnet is the provider of the services. In addition, Commnet’s application/certification form will state that subscribers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

¹⁷ *Lifeline Modernization Order*, ¶364.

I. Commnet will comply with the additional ETC obligations.

Commnet is aware of the Commission's requirements regarding certification and verification of a customer's qualification for Lifeline service, as set forth in 47 C.F.R. § 54.410, and already employs procedures to ensure those requirements are met, with respect to Commnet's pre-existing Lifeline offerings.¹⁸ Commnet has detailed and comprehensive procedures in place to address customer certification and verification requirements as well as those requirements addressing de-enrollment and duplication of benefits.¹⁹ These procedures comply with the Commission's customer certification and verification requirements.²⁰

Commnet also checks each applicant against the National Lifeline Accountability Database prior to initiating service, as well as against Commnet's own duplicate checking system. Commnet will utilize the National Lifeline Eligibility Verifier once that system is available. Commnet also complies, and will continue to comply, with the annual certification and reporting requirements and the Commission's measures to prevent waste, fraud and abuse of Lifeline services.²¹ Commnet will not seek Lifeline reimbursement for any subscriber that received Lifeline-supported mobile broadband service from another provider within the previous twelve months, except as permitted by Commission rules.²²

A Commnet employee will be responsible for overseeing and finalizing every Lifeline enrollment prior to including that subscriber on an FCC Form 497 for reimbursement. Finally, Commnet does not charge a number-portability fee for Lifeline accounts.²³ Commnet will timely

¹⁸ Among other things, Commnet retains copies of documentation demonstrating the applicant's income-based or program-based eligibility determination for Lifeline service as required by Commission rules. *See* 47 C.F.R. § 54.410(b)(1)(ii), (c)(1)(ii).

¹⁹ *See* 47 C.F.R. §§ 54.405(e), 54.410(d)-(f).

²⁰ *See* 47 C.F.R. § 54.410.

²¹ *See* 47 C.F.R. §§ 54.416, 54.422.

²² *See* 47 C.F.R. § 54.411(a),(c).

²³ *See* 47 C.F.R. § 54.401(e).

pay all applicable federal, state, and local regulatory fees, including universal service and E911 fees.

J. Commnet qualifies for streamlined processing of its LBP ETC designation

The Commission has sole jurisdiction, pursuant to section 214(e)(6), to review and grant the Company's request for designation as an LBP ETC and, in its *Lifeline Modernization Order*, ¶232, the Commission explicitly preempted state designation of broadband providers. Commission rule 54.202(d) provides for a streamlined process for approving LBP ETC petitions where certain criteria are met. Petitions for LBP ETC designation are deemed granted within sixty days of the filing date if the applicant has provided BIAS to the public for at least two years and serves at least 1,000 non-Lifeline subscribers with voice telephony and/or BIAS as of the filing date. *See* 47 C.F.R. § 54.202(d)(1). Commnet qualifies for this streamlined processing, as it has been offering BIAS for at least two years, and serves over 38,000 voice and/or BIAS subscribers, including 12,900 non-Lifeline subscribers as of the date of this filing. Therefore, Commnet seeks streamlined designation of its request for LBP ETC designation in the areas identified below.

K. Areas for Which LBP ETC Status Is Requested

By this Petition, Commnet requests LBP ETC designation to serve the Tribal areas set forth in set forth in **Exhibit A**. According to 2000 Census Data issued by the U.S. Census Bureau, 24.6% of the residents on the Northern Cheyenne Reservation had no telephone service. Furthermore, as the 2000 census data demonstrates below, the requested areas (1) have low per capita incomes, high unemployment rates and high poverty levels; and (2) are entirely rural and sparsely populated.

Northern Cheyenne Reservation, MT	
Total Population in Proposed Service Area	4,470
Unemployment Rate in Proposed Service Area	19.50%
Population not in labor force	44.10%
Population below Poverty Level	39.30%
Per Capita Income	\$7,736
Area considered Non-farm Rural	100%

L. Notice to affected Tribal Government and Tribal Regulatory Authority

Section 54.202(c) requires a common carrier that seeks designation as an ETC under Section 214(c)(6) on Tribal lands to provide a copy of its petition to the affected tribal government and tribal regulatory authority at the time it files its petition with the Commission. Commnet acknowledges such a requirement and certifies that a copy of its Petition will be provided to the tribal governments and/or tribal regulatory authorities identified in **Exhibit B** at the time of this filing.

III. THE PUBLIC INTEREST WILL BENEFIT FROM GRANTING LBP ETC STATUS TO COMMNET

Before granting a request for ETC designation, the Commission must find that grant of the designation would be in the public interest. The Commission has described broadband as the “essential communications medium of the digital economy,” noting that “[a]ccess to broadband shortens the distance to high-quality education, meaningful employment, and reliable healthcare. It is now the dominant technology used to communicate, educate, inform, and entertain.”²⁴ However, the Commission has recognized that a “digital divide” still exists with low-income consumers “adopting broadband at rates well below the rest of the country.”²⁵

²⁴ *Lifeline Modernization Order*, ¶12

²⁵ *Id.*, ¶19

Grant of Commnet's Petition will enable the Company to expand its provision of service to Lifeline-eligible consumers with access to convenient and much-needed Internet access at 3G speeds, thereby helping to bridge the digital divide. Moreover, Commnet's Lifeline-supported mobile broadband service plan is designed with disadvantaged consumers in mind and, as such, will help the Commission meet core Lifeline program goals, including closing the job and homework gaps and increasing competitive pressure to ensure that subscribers get high value for their Lifeline benefits.

Specifically, the Company will offer to low-income consumers a prepaid mobile broadband service, with at least 500 MB of data per month on its 3G and 4G networks at no cost to the consumer, thereby increasing consumer choice and making services more affordable and accessible.²⁶ The monthly allowance of at least 500 MB of data per month on its 3G and 4G networks provides speed and capacity for consumers to utilize the Internet to meet their work, health and school-related needs. When coupled with free Wi-Fi available in community anchor institutions, local businesses and elsewhere, Commnet's mobile broadband service will enable subscriber access to multiple gigabytes worth of data each month, enabling those consumers to use data-hungry apps and services such as online video courses and real-time video communications just like non-Lifeline consumers. The Company will also offer for customers at least one handset with hotspot capability for no charge. The hotspot capability enables consumers to use their Commnet data by tethering a variety of different devices, including laptops and tablets, to complete homework assignments or conduct other activities that sometimes require a larger screen.

Commnet's broadband service will enable Lifeline-eligible subscribers to access the

²⁶ As previously noted, this 500 MB/mo will be increasing over time in accordance with the Commission's staged schedule for LBP ETCs to deliver 2 GB/mo by December 1, 2018.

Internet for tasks such as researching jobs, communicating with their employer, children's schools or family and friends by email, or completing homework assignments. The mobile nature of the service will be particularly attractive to Lifeline-eligible consumers who will then have immediate and convenient Internet access – at home, on a bus commuting to work or school or during a lunch break at work – thereby eliminating the need to undertake time-consuming or costly travel to a library or other location for public internet access.

Commnet's experience and longevity as a provider of Lifeline services in rural areas across the West and Southwest demonstrates the Company's commitment and ability to provide quality Lifeline services to eligible, low-income consumers in compliance with program requirements. As of September 2016, Commnet provided Lifeline voice telecommunications services to over 25,000 Lifeline subscribers and has established detailed and comprehensive procedures to ensure service is provided in compliance with Lifeline requirements. Commnet will leverage this experience and expertise to ensure its Lifeline-supported mobile broadband services are offered in compliance with the Commission's rules, thereby eliminating waste, fraud and abuse of the Lifeline program. This proven track record, combined with an attractive offering of broadband capacity, the ability to supplement capacity at affordable rates, and the provision of a Wi-Fi-enabled smartphone at no charge ensures Commnet will provide more choices and more value for Lifeline eligible consumers. Accordingly, grant of the Petition is in the public interest.

IV. ANTI-DRUG ABUSE CERTIFICATION

Commnet certifies that no party to this Petition is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

V. CONCLUSION

For the foregoing reasons, grant of the instant Petition for Limited Designation as an LBP ETC is in the public interest and is warranted in accordance with section 214(e)(6) of the Act.

Respectfully submitted,

COMMNET WIRELESS, LLC

December 8, 2016

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By: _____
David J. Kaufman, Its Attorney
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202-955-5516

DECLARATION

I, Rohan Ranaraja, hereby declare under penalty of perjury, that I am the officer of Commnet Wireless, LLC in charge of Lifeline-support administration and compliance, that I have read the foregoing Petition for Streamlined Designation as a Lifeline Broadband Provider Eligible Telecommunications Carrier, and that to the best of my knowledge, information and belief, all facts set forth therein (including without limitation the certification that no party to this Petition is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862) are true and correct.

Executed December 7, 2016



Rohan Ranaraja

COMMNET WIRELESS, LLC

PETITION FOR STREAMLINED DESIGNATION AS LBP ETC

EXHIBIT A

COMMNET WIRELESS, LLC
EXHIBIT A

State Name	County Name	Block	Block ID
Montana	Big Horn	1000	300039404001000
Montana	Big Horn	1001	300039404001001
Montana	Big Horn	1002	300039404001002
Montana	Big Horn	1003	300039404001003
Montana	Big Horn	1004	300039404001004
Montana	Big Horn	1005	300039404001005
Montana	Big Horn	1006	300039404001006
Montana	Big Horn	1007	300039404001007
Montana	Big Horn	1008	300039404001008
Montana	Big Horn	1009	300039404001009
Montana	Big Horn	1010	300039404001010
Montana	Big Horn	1011	300039404001011
Montana	Big Horn	1012	300039404001012
Montana	Big Horn	1013	300039404001013
Montana	Big Horn	1014	300039404001014
Montana	Big Horn	1015	300039404001015
Montana	Big Horn	1016	300039404001016
Montana	Big Horn	1017	300039404001017
Montana	Big Horn	1018	300039404001018
Montana	Big Horn	1019	300039404001019
Montana	Big Horn	1020	300039404001020
Montana	Big Horn	1021	300039404001021
Montana	Big Horn	1022	300039404001022
Montana	Big Horn	1023	300039404001023
Montana	Big Horn	1024	300039404001024
Montana	Big Horn	1025	300039404001025
Montana	Big Horn	1026	300039404001026
Montana	Big Horn	1027	300039404001027
Montana	Big Horn	1028	300039404001028
Montana	Big Horn	1029	300039404001029
Montana	Big Horn	1030	300039404001030
Montana	Big Horn	1031	300039404001031
Montana	Big Horn	1032	300039404001032
Montana	Big Horn	1033	300039404001033
Montana	Big Horn	1034	300039404001034
Montana	Big Horn	1035	300039404001035
Montana	Big Horn	1036	300039404001036
Montana	Big Horn	1037	300039404001037
Montana	Big Horn	1038	300039404001038
Montana	Big Horn	1039	300039404001039
Montana	Big Horn	1040	300039404001040
Montana	Big Horn	1041	300039404001041
Montana	Big Horn	1042	300039404001042
Montana	Big Horn	1043	300039404001043
Montana	Big Horn	1044	300039404001044

COMMNET WIRELESS, LLC
EXHIBIT A

State Name	County Name	Block	Block ID
Montana	Big Horn	1045	300039404001045
Montana	Big Horn	1046	300039404001046
Montana	Big Horn	1047	300039404001047
Montana	Big Horn	1048	300039404001048
Montana	Big Horn	1049	300039404001049
Montana	Big Horn	1050	300039404001050
Montana	Big Horn	1051	300039404001051
Montana	Big Horn	1052	300039404001052
Montana	Big Horn	1053	300039404001053
Montana	Big Horn	1054	300039404001054
Montana	Big Horn	1055	300039404001055
Montana	Big Horn	1056	300039404001056
Montana	Big Horn	1057	300039404001057
Montana	Big Horn	1058	300039404001058
Montana	Big Horn	1059	300039404001059
Montana	Big Horn	1060	300039404001060
Montana	Big Horn	1061	300039404001061
Montana	Big Horn	1062	300039404001062
Montana	Big Horn	1063	300039404001063
Montana	Big Horn	1064	300039404001064
Montana	Big Horn	1065	300039404001065
Montana	Big Horn	1066	300039404001066
Montana	Big Horn	1067	300039404001067
Montana	Big Horn	1068	300039404001068
Montana	Big Horn	1069	300039404001069
Montana	Big Horn	1070	300039404001070
Montana	Big Horn	1071	300039404001071
Montana	Big Horn	1072	300039404001072
Montana	Big Horn	1073	300039404001073
Montana	Big Horn	1074	300039404001074
Montana	Big Horn	1075	300039404001075
Montana	Big Horn	1076	300039404001076
Montana	Big Horn	1077	300039404001077
Montana	Big Horn	1078	300039404001078
Montana	Big Horn	1079	300039404001079
Montana	Big Horn	1080	300039404001080
Montana	Big Horn	1081	300039404001081
Montana	Big Horn	1082	300039404001082
Montana	Big Horn	1083	300039404001083
Montana	Big Horn	1084	300039404001084
Montana	Big Horn	1085	300039404001085
Montana	Big Horn	1086	300039404001086
Montana	Big Horn	1087	300039404001087
Montana	Big Horn	1088	300039404001088
Montana	Big Horn	1089	300039404001089

COMMNET WIRELESS, LLC
EXHIBIT A

State Name	County Name	Block	Block ID
Montana	Big Horn	1090	300039404001090
Montana	Big Horn	1091	300039404001091
Montana	Big Horn	1092	300039404001092
Montana	Big Horn	1093	300039404001093
Montana	Big Horn	1094	300039404001094
Montana	Big Horn	1095	300039404001095
Montana	Big Horn	1096	300039404001096
Montana	Big Horn	1097	300039404001097
Montana	Big Horn	1098	300039404001098
Montana	Big Horn	1099	300039404001099
Montana	Big Horn	1100	300039404001100
Montana	Big Horn	1101	300039404001101
Montana	Big Horn	1102	300039404001102
Montana	Big Horn	1103	300039404001103
Montana	Big Horn	1104	300039404001104
Montana	Big Horn	1105	300039404001105
Montana	Big Horn	1106	300039404001106
Montana	Big Horn	1107	300039404001107
Montana	Big Horn	1108	300039404001108
Montana	Big Horn	1109	300039404001109
Montana	Big Horn	1110	300039404001110
Montana	Big Horn	1111	300039404001111
Montana	Big Horn	1112	300039404001112
Montana	Big Horn	1113	300039404001113
Montana	Big Horn	1114	300039404001114
Montana	Big Horn	1115	300039404001115
Montana	Big Horn	1116	300039404001116
Montana	Big Horn	1117	300039404001117
Montana	Big Horn	1118	300039404001118
Montana	Big Horn	1119	300039404001119
Montana	Big Horn	1120	300039404001120
Montana	Big Horn	1121	300039404001121
Montana	Big Horn	1122	300039404001122
Montana	Big Horn	1123	300039404001123
Montana	Big Horn	1124	300039404001124
Montana	Big Horn	1125	300039404001125
Montana	Big Horn	1126	300039404001126
Montana	Big Horn	1127	300039404001127
Montana	Big Horn	1128	300039404001128
Montana	Big Horn	1129	300039404001129
Montana	Big Horn	1130	300039404001130
Montana	Big Horn	1131	300039404001131
Montana	Big Horn	1132	300039404001132
Montana	Big Horn	1133	300039404001133
Montana	Big Horn	1134	300039404001134

COMMNET WIRELESS, LLC
EXHIBIT A

State Name	County Name	Block	Block ID
Montana	Big Horn	1135	300039404001135
Montana	Big Horn	1136	300039404001136
Montana	Big Horn	1137	300039404001137
Montana	Big Horn	1138	300039404001138
Montana	Big Horn	1139	300039404001139
Montana	Big Horn	1140	300039404001140
Montana	Big Horn	1141	300039404001141
Montana	Big Horn	1142	300039404001142
Montana	Big Horn	1143	300039404001143
Montana	Big Horn	1144	300039404001144
Montana	Big Horn	1145	300039404001145
Montana	Big Horn	1146	300039404001146
Montana	Big Horn	1147	300039404001147
Montana	Big Horn	1148	300039404001148
Montana	Big Horn	1149	300039404001149
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Montana	Big Horn	1151	300039404001151
Montana	Big Horn	1152	300039404001152
Montana	Big Horn	1153	300039404001153
Montana	Big Horn	1154	300039404001154
Montana	Big Horn	1155	300039404001155
Montana	Big Horn	1156	300039404001156
Montana	Big Horn	1157	300039404001157
Montana	Big Horn	1158	300039404001158
Montana	Big Horn	1159	300039404001159
Montana	Big Horn	1160	300039404001160
Montana	Big Horn	1161	300039404001161
Montana	Big Horn	1162	300039404001162
Montana	Big Horn	1163	300039404001163
Montana	Big Horn	1164	300039404001164
Montana	Big Horn	1165	300039404001165
Montana	Big Horn	1166	300039404001166
Montana	Big Horn	1167	300039404001167
Montana	Big Horn	1168	300039404001168
Montana	Big Horn	1169	300039404001169
Montana	Big Horn	1170	300039404001170
Montana	Big Horn	1171	300039404001171
Montana	Big Horn	1172	300039404001172
Montana	Big Horn	1173	300039404001173
Montana	Big Horn	1174	300039404001174
Montana	Big Horn	1175	300039404001175
Montana	Big Horn	1176	300039404001176
Montana	Big Horn	1177	300039404001177
Montana	Big Horn	1178	300039404001178
Montana	Big Horn	1179	300039404001179

COMMNET WIRELESS, LLC
EXHIBIT A

State Name	County Name	Block	Block ID
Montana	Big Horn	1180	300039404001180
Montana	Big Horn	1181	300039404001181
Montana	Big Horn	1182	300039404001182
Montana	Big Horn	1183	300039404001183
Montana	Big Horn	1184	300039404001184
Montana	Big Horn	1185	300039404001185
Montana	Big Horn	1186	300039404001186
Montana	Big Horn	1187	300039404001187
Montana	Big Horn	1188	300039404001188
Montana	Big Horn	1189	300039404001189
Montana	Big Horn	1190	300039404001190
Montana	Big Horn	1191	300039404001191
Montana	Big Horn	1192	300039404001192
Montana	Big Horn	1193	300039404001193
Montana	Big Horn	1194	300039404001194
Montana	Big Horn	1195	300039404001195
Montana	Big Horn	1196	300039404001196
Montana	Big Horn	1197	300039404001197
Montana	Big Horn	1198	300039404001198
Montana	Big Horn	1199	300039404001199
Montana	Big Horn	1200	300039404001200
Montana	Big Horn	1201	300039404001201
Montana	Big Horn	1202	300039404001202
Montana	Big Horn	1203	300039404001203
Montana	Big Horn	1204	300039404001204
Montana	Big Horn	1205	300039404001205
Montana	Big Horn	1206	300039404001206
Montana	Big Horn	1207	300039404001207
Montana	Big Horn	1208	300039404001208
Montana	Big Horn	1209	300039404001209
Montana	Big Horn	1217	300039404001217
Montana	Big Horn	1218	300039404001218
Montana	Big Horn	1576	300039404001576
Montana	Big Horn	1585	300039404001585
Montana	Big Horn	1586	300039404001586
Montana	Rosebud	1000	300879404001000
Montana	Rosebud	1001	300879404001001
Montana	Rosebud	1002	300879404001002
Montana	Rosebud	1003	300879404001003
Montana	Rosebud	1004	300879404001004
Montana	Rosebud	1005	300879404001005
Montana	Rosebud	1006	300879404001006
Montana	Rosebud	1007	300879404001007
Montana	Rosebud	1008	300879404001008
Montana	Rosebud	1009	300879404001009

COMMNET WIRELESS, LLC

EXHIBIT A

State Name	County Name	Block	Block ID
Montana	Rosebud	1010	300879404001010
Montana	Rosebud	1011	300879404001011
Montana	Rosebud	1012	300879404001012
Montana	Rosebud	1013	300879404001013
Montana	Rosebud	1014	300879404001014
Montana	Rosebud	1015	300879404001015
Montana	Rosebud	1016	300879404001016
Montana	Rosebud	1017	300879404001017
Montana	Rosebud	1018	300879404001018
Montana	Rosebud	1019	300879404001019
Montana	Rosebud	1020	300879404001020
Montana	Rosebud	1021	300879404001021
Montana	Rosebud	1022	300879404001022
Montana	Rosebud	1023	300879404001023
Montana	Rosebud	1024	300879404001024
Montana	Rosebud	1025	300879404001025
Montana	Rosebud	1026	300879404001026
Montana	Rosebud	1027	300879404001027
Montana	Rosebud	1028	300879404001028
Montana	Rosebud	1029	300879404001029
Montana	Rosebud	1030	300879404001030
Montana	Rosebud	1031	300879404001031
Montana	Rosebud	1032	300879404001032
Montana	Rosebud	1033	300879404001033
Montana	Rosebud	1034	300879404001034
Montana	Rosebud	1035	300879404001035
Montana	Rosebud	1036	300879404001036
Montana	Rosebud	1037	300879404001037
Montana	Rosebud	1038	300879404001038
Montana	Rosebud	1039	300879404001039
Montana	Rosebud	1040	300879404001040
Montana	Rosebud	1041	300879404001041
Montana	Rosebud	1042	300879404001042
Montana	Rosebud	1043	300879404001043
Montana	Rosebud	1044	300879404001044
Montana	Rosebud	1045	300879404001045
Montana	Rosebud	1046	300879404001046
Montana	Rosebud	1047	300879404001047
Montana	Rosebud	1048	300879404001048
Montana	Rosebud	1049	300879404001049
Montana	Rosebud	1050	300879404001050
Montana	Rosebud	1051	300879404001051
Montana	Rosebud	1052	300879404001052
Montana	Rosebud	1053	300879404001053
Montana	Rosebud	1054	300879404001054

COMMNET WIRELESS, LLC

EXHIBIT A

State Name	County Name	Block	Block ID
Montana	Rosebud	1055	300879404001055
Montana	Rosebud	1056	300879404001056
Montana	Rosebud	1057	300879404001057
Montana	Rosebud	1058	300879404001058
Montana	Rosebud	1059	300879404001059
Montana	Rosebud	1060	300879404001060
Montana	Rosebud	1061	300879404001061
Montana	Rosebud	1062	300879404001062
Montana	Rosebud	1063	300879404001063
Montana	Rosebud	1064	300879404001064
Montana	Rosebud	1065	300879404001065
Montana	Rosebud	1066	300879404001066
Montana	Rosebud	1067	300879404001067
Montana	Rosebud	1068	300879404001068
Montana	Rosebud	1069	300879404001069
Montana	Rosebud	1070	300879404001070
Montana	Rosebud	1071	300879404001071
Montana	Rosebud	1072	300879404001072
Montana	Rosebud	1073	300879404001073
Montana	Rosebud	1074	300879404001074
Montana	Rosebud	1075	300879404001075
Montana	Rosebud	1076	300879404001076
Montana	Rosebud	1077	300879404001077
Montana	Rosebud	1078	300879404001078
Montana	Rosebud	1079	300879404001079
Montana	Rosebud	1080	300879404001080
Montana	Rosebud	1081	300879404001081
Montana	Rosebud	1082	300879404001082
Montana	Rosebud	1083	300879404001083
Montana	Rosebud	1084	300879404001084
Montana	Rosebud	1085	300879404001085
Montana	Rosebud	1086	300879404001086
Montana	Rosebud	1087	300879404001087
Montana	Rosebud	1088	300879404001088
Montana	Rosebud	1089	300879404001089
Montana	Rosebud	1090	300879404001090
Montana	Rosebud	1091	300879404001091
Montana	Rosebud	1092	300879404001092
Montana	Rosebud	1093	300879404001093
Montana	Rosebud	1094	300879404001094
Montana	Rosebud	1095	300879404001095
Montana	Rosebud	1096	300879404001096
Montana	Rosebud	1097	300879404001097
Montana	Rosebud	1098	300879404001098
Montana	Rosebud	1099	300879404001099

COMMNET WIRELESS, LLC
EXHIBIT A

State Name	County Name	Block	Block ID
Montana	Rosebud	1100	300879404001100
Montana	Rosebud	1101	300879404001101
Montana	Rosebud	1102	300879404001102
Montana	Rosebud	1103	300879404001103
Montana	Rosebud	1104	300879404001104
Montana	Rosebud	1105	300879404001105
Montana	Rosebud	1106	300879404001106
Montana	Rosebud	1107	300879404001107
Montana	Rosebud	1108	300879404001108
Montana	Rosebud	1109	300879404001109
Montana	Rosebud	1110	300879404001110
Montana	Rosebud	1111	300879404001111
Montana	Rosebud	1112	300879404001112
Montana	Rosebud	1113	300879404001113
Montana	Rosebud	1114	300879404001114
Montana	Rosebud	1115	300879404001115
Montana	Rosebud	1116	300879404001116
Montana	Rosebud	1117	300879404001117
Montana	Rosebud	1118	300879404001118
Montana	Rosebud	1119	300879404001119
Montana	Rosebud	1120	300879404001120
Montana	Rosebud	1121	300879404001121
Montana	Rosebud	1122	300879404001122
Montana	Rosebud	1123	300879404001123
Montana	Rosebud	1124	300879404001124
Montana	Rosebud	1125	300879404001125
Montana	Rosebud	1126	300879404001126
Montana	Rosebud	1127	300879404001127
Montana	Rosebud	1128	300879404001128
Montana	Rosebud	1129	300879404001129
Montana	Rosebud	1130	300879404001130
Montana	Rosebud	1131	300879404001131
Montana	Rosebud	1132	300879404001132
Montana	Rosebud	1133	300879404001133
Montana	Rosebud	1134	300879404001134
Montana	Rosebud	1135	300879404001135
Montana	Rosebud	1136	300879404001136
Montana	Rosebud	1137	300879404001137
Montana	Rosebud	1138	300879404001138
Montana	Rosebud	1139	300879404001139
Montana	Rosebud	1140	300879404001140
Montana	Rosebud	1141	300879404001141
Montana	Rosebud	1142	300879404001142
Montana	Rosebud	1143	300879404001143
Montana	Rosebud	1144	300879404001144

COMMNET WIRELESS, LLC
EXHIBIT A

State Name	County Name	Block	Block ID
Montana	Rosebud	1145	300879404001145
Montana	Rosebud	1146	300879404001146
Montana	Rosebud	1147	300879404001147
Montana	Rosebud	1148	300879404001148
Montana	Rosebud	1149	300879404001149
Montana	Rosebud	1150	300879404001150
Montana	Rosebud	1151	300879404001151
Montana	Rosebud	1152	300879404001152
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Montana	Rosebud	2013	300879404002013
Montana	Rosebud	2014	300879404002014
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Montana	Rosebud	2016	300879404002016
Montana	Rosebud	2017	300879404002017
Montana	Rosebud	2018	300879404002018
Montana	Rosebud	2019	300879404002019
Montana	Rosebud	2020	300879404002020
Montana	Rosebud	2021	300879404002021
Montana	Rosebud	2022	300879404002022
Montana	Rosebud	2023	300879404002023
Montana	Rosebud	2024	300879404002024
Montana	Rosebud	2025	300879404002025
Montana	Rosebud	2026	300879404002026
Montana	Rosebud	2027	300879404002027
Montana	Rosebud	2028	300879404002028
Montana	Rosebud	2029	300879404002029
Montana	Rosebud	2030	300879404002030
Montana	Rosebud	2031	300879404002031
Montana	Rosebud	2032	300879404002032
Montana	Rosebud	2033	300879404002033
Montana	Rosebud	2034	300879404002034

COMMNET WIRELESS, LLC

EXHIBIT A

State Name	County Name	Block	Block ID
Montana	Rosebud	2035	300879404002035
Montana	Rosebud	2036	300879404002036
Montana	Rosebud	2037	300879404002037
Montana	Rosebud	2038	300879404002038
Montana	Rosebud	2039	300879404002039
Montana	Rosebud	2040	300879404002040
Montana	Rosebud	2041	300879404002041
Montana	Rosebud	2042	300879404002042
Montana	Rosebud	2043	300879404002043
Montana	Rosebud	2044	300879404002044
Montana	Rosebud	2046	300879404002046
Montana	Rosebud	2047	300879404002047
Montana	Rosebud	2048	300879404002048
Montana	Rosebud	2049	300879404002049
Montana	Rosebud	2050	300879404002050
Montana	Rosebud	2051	300879404002051
Montana	Rosebud	2052	300879404002052
Montana	Rosebud	2053	300879404002053
Montana	Rosebud	2054	300879404002054
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Montana	Rosebud	2056	300879404002056
Montana	Rosebud	2057	300879404002057
Montana	Rosebud	2058	300879404002058
Montana	Rosebud	2059	300879404002059
Montana	Rosebud	2060	300879404002060
Montana	Rosebud	2061	300879404002061
Montana	Rosebud	2062	300879404002062
Montana	Rosebud	2063	300879404002063
Montana	Rosebud	2064	300879404002064
Montana	Rosebud	2065	300879404002065
Montana	Rosebud	2066	300879404002066
Montana	Rosebud	2067	300879404002067
Montana	Rosebud	2071	300879404002071
Montana	Rosebud	2072	300879404002072
Montana	Rosebud	2073	300879404002073
Montana	Rosebud	2074	300879404002074
Montana	Rosebud	2075	300879404002075
Montana	Rosebud	2076	300879404002076
Montana	Rosebud	2077	300879404002077
Montana	Rosebud	2078	300879404002078
Montana	Rosebud	2079	300879404002079
Montana	Rosebud	2080	300879404002080
Montana	Rosebud	2081	300879404002081
Montana	Rosebud	2082	300879404002082
Montana	Rosebud	2083	300879404002083

COMMNET WIRELESS, LLC
EXHIBIT A

State Name	County Name	Block	Block ID
Montana	Rosebud	2084	300879404002084
Montana	Rosebud	2085	300879404002085
Montana	Rosebud	2086	300879404002086
Montana	Rosebud	2087	300879404002087
Montana	Rosebud	2088	300879404002088
Montana	Rosebud	2089	300879404002089
Montana	Rosebud	2090	300879404002090
Montana	Rosebud	2091	300879404002091
Montana	Rosebud	2092	300879404002092
Montana	Rosebud	2093	300879404002093
Montana	Rosebud	2094	300879404002094
Montana	Rosebud	2095	300879404002095
Montana	Rosebud	2096	300879404002096
Montana	Rosebud	2097	300879404002097
Montana	Rosebud	2098	300879404002098
Montana	Rosebud	2099	300879404002099
Montana	Rosebud	2100	300879404002100
Montana	Rosebud	2101	300879404002101
Montana	Rosebud	2102	300879404002102
Montana	Rosebud	2103	300879404002103
Montana	Rosebud	2104	300879404002104
Montana	Rosebud	2105	300879404002105
Montana	Rosebud	2106	300879404002106
Montana	Rosebud	2107	300879404002107
Montana	Rosebud	2108	300879404002108
Montana	Rosebud	2109	300879404002109
Montana	Rosebud	2110	300879404002110
Montana	Rosebud	2111	300879404002111
Montana	Rosebud	2112	300879404002112
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Montana	Rosebud	2114	300879404002114
Montana	Rosebud	2115	300879404002115
Montana	Rosebud	2116	300879404002116
Montana	Rosebud	2117	300879404002117
Montana	Rosebud	2118	300879404002118
Montana	Rosebud	2119	300879404002119
Montana	Rosebud	2120	300879404002120
Montana	Rosebud	2121	300879404002121
Montana	Rosebud	2122	300879404002122
Montana	Rosebud	2123	300879404002123
Montana	Rosebud	2124	300879404002124
Montana	Rosebud	2125	300879404002125
Montana	Rosebud	2126	300879404002126
Montana	Rosebud	2127	300879404002127
Montana	Rosebud	2128	300879404002128

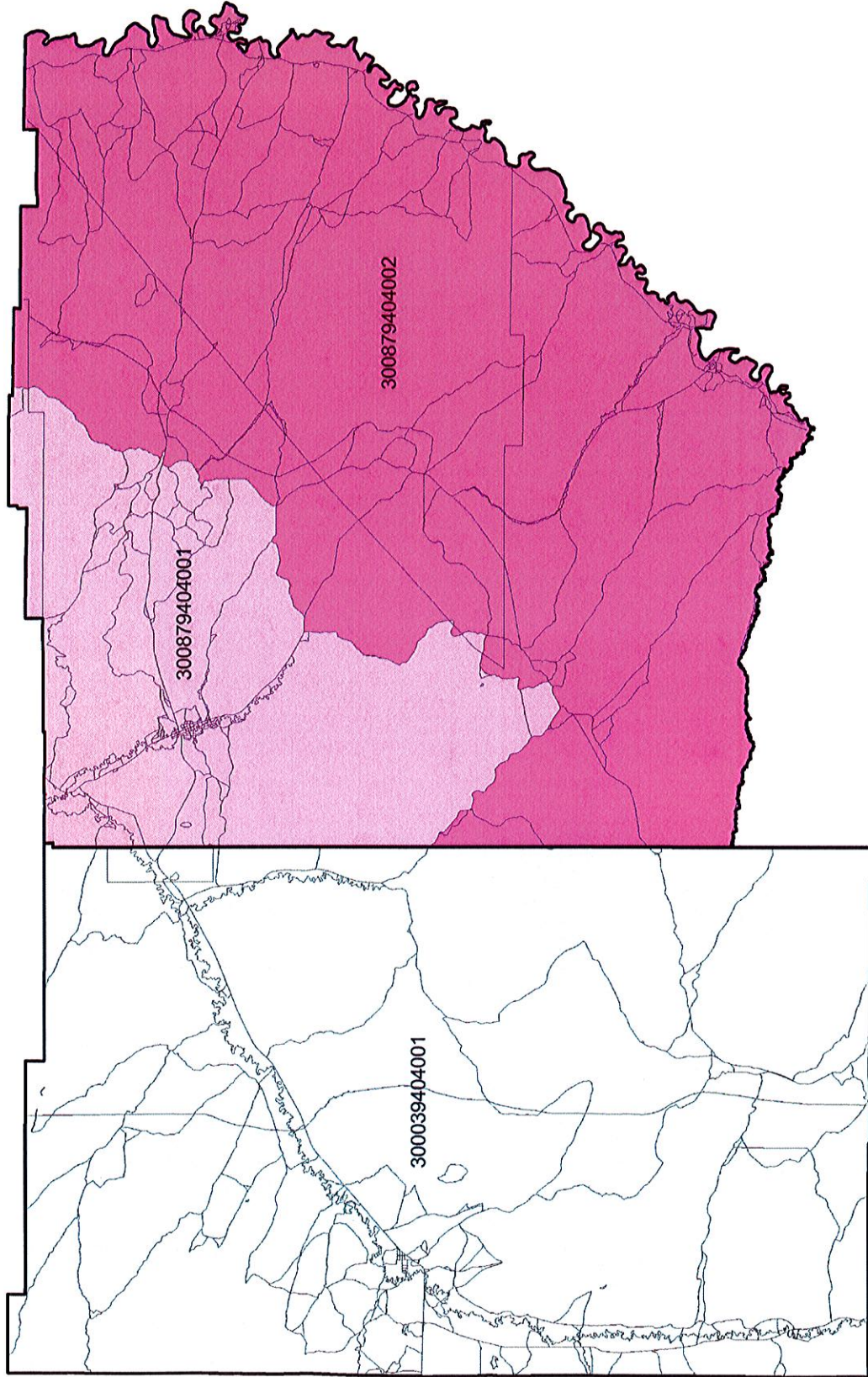
COMMNET WIRELESS, LLC

EXHIBIT A

State Name	County Name	Block	Block ID
Montana	Rosebud	2129	300879404002129
Montana	Rosebud	2130	300879404002130
Montana	Rosebud	2131	300879404002131
Montana	Rosebud	2132	300879404002132
Montana	Rosebud	2133	300879404002133
Montana	Rosebud	2134	300879404002134
Montana	Rosebud	2135	300879404002135
Montana	Rosebud	2136	300879404002136
Montana	Rosebud	2137	300879404002137
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Montana	Rosebud	2153	300879404002153
Montana	Rosebud	2154	300879404002154
Montana	Rosebud	2156	300879404002156
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Montana	Rosebud	2158	300879404002158
Montana	Rosebud	2159	300879404002159
Montana	Rosebud	2163	300879404002163
Montana	Rosebud	2164	300879404002164
Montana	Rosebud	2165	300879404002165
Montana	Rosebud	2166	300879404002166
Montana	Rosebud	2167	300879404002167
Montana	Rosebud	2168	300879404002168
Montana	Rosebud	2169	300879404002169
Montana	Rosebud	2170	300879404002170
Montana	Rosebud	2171	300879404002171
Montana	Rosebud	2172	300879404002172
Montana	Rosebud	2173	300879404002173
Montana	Rosebud	2174	300879404002174
Montana	Rosebud	2175	300879404002175
Montana	Rosebud	2176	300879404002176
Montana	Rosebud	2177	300879404002177

COMMNET WIRELESS, LLC
EXHIBIT A

State Name	County Name	Block	Block ID
Montana	Rosebud	2178	300879404002178
Montana	Rosebud	2179	300879404002179
Montana	Rosebud	2180	300879404002180
Montana	Rosebud	2181	300879404002181
Montana	Rosebud	2182	300879404002182
Montana	Rosebud	2183	300879404002183
Montana	Rosebud	2184	300879404002184
Montana	Rosebud	2185	300879404002185
Montana	Rosebud	2186	300879404002186
Montana	Rosebud	2187	300879404002187
Montana	Rosebud	2188	300879404002188
Montana	Rosebud	2189	300879404002189
Montana	Rosebud	2190	300879404002190
Montana	Rosebud	2191	300879404002191
Montana	Rosebud	2192	300879404002192
Montana	Rosebud	2193	300879404002193
Montana	Rosebud	2194	300879404002194
Montana	Rosebud	2195	300879404002195
Montana	Rosebud	2196	300879404002196
Montana	Rosebud	2197	300879404002197
Montana	Rosebud	2198	300879404002198
Montana	Rosebud	2199	300879404002199
Montana	Rosebud	2200	300879404002200
Montana	Rosebud	2201	300879404002201
Montana	Rosebud	2202	300879404002202
Montana	Rosebud	2205	300879404002205
Montana	Rosebud	2208	300879404002208
Montana	Rosebud	2209	300879404002209
Montana	Rosebud	2210	300879404002210
Montana	Rosebud	2212	300879404002212
Montana	Rosebud	2213	300879404002213
Montana	Rosebud	2214	300879404002214
Montana	Rosebud	2215	300879404002215
Montana	Rosebud	2217	300879404002217
Montana	Rosebud	2218	300879404002218
Montana	Rosebud	2219	300879404002219



COMMNET WIRELESS, LLC
PETITION FOR STREAMLINED DESIGNATION AS LBP ETC

EXHIBIT B

COMMNET WIRELESS, LLC
EXHIBIT B

Northern Cheyenne Tribal Government

President Lawrence Jace Killsback

PO Box 128

Lame Deer, MT 59043

Telephone: (406) 477-6284